



BellSouth Telecommunications, Inc.  
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November 9, 2000

Guy M. Hicks  
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VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

RE: *All Telephone Companies Tariff Filings Regarding Reclassification Of  
Pay Telephone Service As Required By Federal Communications  
Commission (FCC) Docket 96-128  
Docket No. 97-00409*

Dear Mr. Waddell:

On November 8, 2000, BellSouth filed its response to the Staff's First Data Request dated October 27, 2000. It has come to our attention that page 4 of that response is missing from the copies. In an abundance of caution, BellSouth is replacing the filing in its entirety with the enclosed fourteen copies. Copies of the enclosed are being provided to counsel of record for all parties. We apologize for any inconvenience.

Very truly yours,

Guy M. Hicks

GMH:ch  
Enclosure

BellSouth Public Communications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00409  
Staff's First Data Requests  
October 27, 2000  
Item No. 1  
Page 1 of 1

REQUEST: Please provide audited financial statements for the calendar years ended December 31, 1997, 1998, 1999 and year-to-date 2000 for BellSouth Public Communications, Inc. Note: If audited financial statements have not been prepared provide unaudited financial statements.

RESPONSE: BellSouth objects to this data request. The subject matter of this docket has devolved to one question: Do the PTAS and SmartLine® rates charged by BellSouth Telecommunications meet the FCC's "new services test?" The audited (or unaudited) financial statements of BellSouth Public Communications, a subsidiary of BellSouth Telecommunications have absolutely no relevance to the issue remaining in this docket.

Moreover, the data is highly proprietary, and the direct competitors of BellSouth Public Communications in Tennessee are the members of the Tennessee Payphone Owners Association ("TPOA"). Nor could the data requested by the Staff even be used by the TPOA in this docket, as there is no further argument or briefing contemplated by the procedural schedule.

Nevertheless, and without waiving the foregoing objections, BellSouth is willing to make the requested information available for review (to the extent the requested information exists) by the Tennessee Regulatory Authority Staff pursuant to an appropriate proprietary agreement at a mutually convenient time and location.

BellSouth Public Communications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00409  
Staff's First Data Requests  
October 27, 2000  
Item No. 2  
Page 1 of 1

REQUEST: Provide financial statements for BellSouth Public Communications, Inc. Tennessee payphone operations for the years ended 1997, 1998, 1999, and year-to-date 2000.

RESPONSE: See response to Item No. 1.

BellSouth Public Communications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00409  
Staff's First Data Requests  
October 27, 2000  
Item No. 3  
Page 1 of 1

REQUEST: Provide the number of payphones in Tennessee served by BellSouth Public Communications, Inc. as of December 31, 1997, 1998, 1999, and October 1, 2000.

RESPONSE: Dec. 1997 = 17,413; 1998 = 17,284; 1999 = 16,094; Oct. 1, 2000 = 15,308

BellSouth Public Communications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00409  
Staff's First Data Requests  
October 27, 2000  
Item No. 4  
Page 1 of 1

REQUEST: Provide the total number of payphones served by BellSouth Public Communications, Inc. as of December 31, 1997, 1998, 1999, and October 1, 2000.

RESPONSE: Dec. 1997 = 166,970; 1998 = 166,630; 1999 = 153,780; Oct. 1, 2000 = 146,925

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00409  
Staff's First Data Requests  
October 27, 2000  
Item No. 5  
Page 1 of 1

REQUEST: Is the cost study information presented in the testimony of D. Daonne Caldwell filed on September 15, 2000, based on jurisdictionally separated or unseparated costs?

RESPONSE: The referenced cost study is based on unseparated costs.

### CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2000, a copy of the foregoing document was served on the parties of record, as follows:

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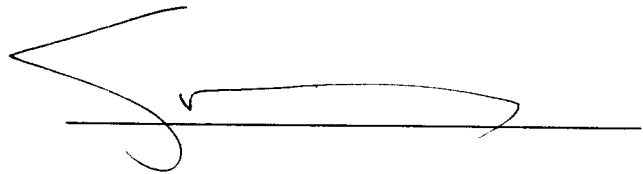
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L. Vincent Williams, Esquire  
Office of Tennessee Attorney General  
425 Fifth Avenue North  
Nashville, Tennessee 37243

A handwritten signature in black ink, appearing to read "L. Vincent Williams", is written over a horizontal line. The signature is stylized with a large, sweeping initial "L" and a long, horizontal stroke extending to the right.